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Filed via ECFS

March 9, 2016

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554
Attn: Wireline Competition Bureau

Re: Connect America Fund, WC Docket No. 10-90

Dear Ms. Dortch,

Franklin Telephone Company ("Franklin") (Study Area Code 280454) and Delta Telephone Company ("Delta") (Study Area Code 280452) (collectively, the "Telapex Companies" or "Companies"), hereby notifies the Federal Communications Commission ("FCC" or "Commission") and the Wireline Competition Bureau ("WCB" or "Bureau") of changes that the Company made to its previous two FCC Form 477s on March 8 and 9, 2016 and requests that these most recent changes be incorporated into the forthcoming versions of the Alternative Connect America Model ("A-CAM").

The Telapex Companies' previously-filed FCC Form 477s containing data as of June 30, 2015 and December 31, 2015 had incorrectly identified the maximum advertised speeds for the purposes of reporting broadband deployment. On March 8, we were informed by our consultant that in an email to them, FCC staff that handle Form 477 reporting clarified that the requirement to report the maximum "advertised" speeds for broadband deployment means the "Point of Sale where the potential customer learns what the true max-speeds are for his/her location" and that "the filer should use the accurate information about speed that is conveyed at the Point of Sale." Our consultants relayed that FCC staff explained, "Another way of looking at this is that the service provider is advertising only partial information at its most general level of advertising—and that the full level of advertising is at the Point of Sale."

Given this clarification, we realized that when we reported broadband deployment in previous filings, we had misunderstood the directions on how the speeds used should be reported. Therefore, we have now filed revisions to our FCC Form 477s containing data as of June 30, 2015 and December 31st, 2015 to accurately reflect the maximum broadband speeds those DSL customers can actually receive.

However, the Telapex Companies remain concerned that these changes will not be incorporated into the forthcoming versions of the A-CAM. The Companies respectfully requests that the FCC allow these corrections to be included in the A-CAM as soon as possible to reflect accurately these facts. Without these corrections, future versions of the A-CAM will not reflect the facts pertaining to the Census Blocks served by the Companies with the correct broadband technology.

Sincerely,


Wade H. Creekmore, Jr.

WHC,JR:jw